

1
2
3
4
5
6
7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 UNITED STATES OF AMERICA,)
11 Plaintiff,)
12 v.)
13 VICTOR HUGO GUTAMA,)
14 a/k/a Hugo Gutama,)
15 Defendant.)

No.: 2:18-cv-00175-RSL

STIPULATED MOTION TO STAY CASE

NOTE ON MOTION CALENDAR: 4/6/2018

16 The United States of America ("United States" or "Plaintiff") and Victor Hugo Gutama,
17 also known as Hugo Gutama ("Defendant"), (together, the "Parties") stipulate and jointly move,
18 pursuant to W.D. Wash. LCR 10(g), for entry of an order staying all proceedings and deadlines
19 in this matter, including Defendant's answer deadline and all initial scheduling dates, for 90 days
20 until approximately July 5, 2018. In support of their request, the Parties state the following:

- 21 1. On February 5, 2018, Plaintiff filed a Complaint to Revoke Naturalization under 8
22 U.S.C. § 1451(a), seeking, *inter alia*, judgment revoking and setting aside
23 Defendant's naturalization and cancelling his certificate of naturalization. Dkt. # 1.
24

2. The complaint was served on Defendant, via his attorney of record, on February 27, 2018. Dkt. # 8. Pursuant to 8 U.S.C. § 1451(b), Defendant's deadline to answer or otherwise respond to the complaint is April 30, 2018.
3. On March 20, 2018, the Court entered an Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement. Dkt. # 9. Pursuant to the order, the deadline for the Parties' Rule 26(f) conference was April 3, 2018; the deadline for Rule 26(a)(1) initial disclosures is April 10, 2018; and the deadline for the combined joint status report and discovery plan is April 17, 2018. *Id.* at p. 1.
4. The Parties have been engaged in discussions concerning whether this case may be resolved without further litigation. Yet, additional time is needed to complete those discussions. Accordingly, the Parties request that all deadlines be stayed in this case for 90 days while they continue their discussions and, if necessary, seek the appropriate approval for any agreement, if reached.
5. A stay in this matter would therefore serve the interests of the Parties, as well as the Court, by preserving resources until it is determined that the claims in this case can only be resolved through litigation. Moreover, the requested stay is not sought for purposes of delay or intended to prejudice any party.
6. At the conclusion of the 90-day stay period, the Parties propose to file a status report on July 5, 2018, updating the Court of any developments and/or setting forth a proposal to govern further proceedings.

WHEREFORE, the Parties respectfully request that the Court grant their stipulated motion and stay all proceedings and deadlines in this matter, including Defendant's answer deadline and all initial scheduling dates, for 90 days until approximately July 5, 2018.

1 Dated: April 6, 2018

2 Respectfully submitted,

3 /s/ Jay Gairson (by TMP w/ permission)
4 Jay Gairson, Esq.
5 Gairson Law, LLC
6 4606 Martin Luther King Jr Wy S
7 Seattle, Washington 98108
8 (206) 357-4218
9 jay@gairson.com

7 **Attorney for Victor Hugo Gutama**

8 CHAD A. READLER
9 Acting Assistant Attorney General


10 WILLIAM C. PEACHEY
11 Director, Office of Immigration Litigation

12 WILLIAM C. SILVIS
13 Assistant Director

14 /s/ T. Monique Peoples
15 T. MONIQUE PEOPLES, DC Bar #973962
16 Senior Litigation Counsel
17 United States Department of Justice
18 Civil Division
19 Office of Immigration Litigation
20 District Court Section
21 P.O. Box 868, Ben Franklin Station
22 Washington, D.C. 20044
23 Telephone: (202) 598-8717
24 Fax: (202) 305-7000
monique.peoples@usdoj.gov

19 **Attorneys for the United States**

20 **DATED: April 9, 2018**
21 **IT IS SO ORDERED.**

22 
23 Hon. Robert S. Lasnik
24 UNITED STATES DISTRICT JUDGE